

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS
EASTERN DIVISION

IN RE:

Claudia Vivien Pearson

Deutsche Bank National Trust Company, as
Trustee for GSAMP TRUST 2006-S1
Mortgage Pass-Through Certificates, Series
2006-S1,

VS.

Claudia Vivien Pearson

CHAPTER 7
CASE NO. 06-13299-WCH

MOTION FOR RELIEF FROM STAY

To the Honorable William C. Hillman:

Deutsche Bank National Trust Company, as Trustee for GSAMP TRUST 2006-S1 Mortgage Pass-Through Certificates, Series 2006-S1, your moving party in the within Motion, respectfully represents:

1. The movant has a mailing address of c/o Washington Mutual Bank P.O. Box 3029, Milwaukee, WI 53201-3029.
2. The debtor, Claudia Vivien Pearson, has a mailing address of 14 Sycamore Ave., Brockton, MA 02301.
3. On September 21, 2006, the debtor filed a petition under Chapter 7 of the United States Bankruptcy Code in the United States Bankruptcy Court for the District of Massachusetts.
4. The movant is the holder of a second mortgage on real estate in the original amount of \$69,200.00 given by Claudia Vivien Pearson to Long Beach Mortgage Company on or about June 23, 2005. Said mortgage is recorded with the Plymouth County Registry of Deeds at

Book 30898, Page 260 and covers the premises located at 14 Sycamore Ave., Brockton, MA 02301.

5. Said mortgage secures a note given by Claudia Vivien Pearson to Long Beach Mortgage Company in the original amount of \$69,200.00.
6. The mortgage has been assigned by Washington Mutual Bank as successor in interest to Long Beach Mortgage Company to Deutsche Bank National Trust Company, as Trustee for GSAMP TRUST 2006-S1 Mortgage Pass-Through Certificates, Series 2006-S1.
7. The movant is unaware of any recorded declaration of homestead against said property.
8. There is no other collateral securing the obligation.
9. As of October 20, 2006, approximately \$71,927.31 in principal, interest, late fees and other charges was due with regard to Deutsche Bank National Trust Company, as Trustee for GSAMP TRUST 2006-S1 Mortgage Pass-Through Certificates, Series 2006-S1's note and mortgage. As a result of this motion, attorney's fees and costs of approximately \$550.00 have accrued. This figure may increase as additional attorney's fees and costs accrue.
10. There are the following encumbrances on the property:

<u>Name of Creditor</u>	<u>Type of Lien</u>	<u>Amount Owed</u>
Washington Mutual Bank	First Mortgage	\$284,957.21
Deutsche Bank National Trust	Second Mortgage	\$71,927.31
Total Secured Encumbrances:		\$356,884.52

11. According to the debtor's schedules, the fair market value of the subject property is \$355,000.00. The liquidation value of the subject property is \$331,581.20, calculated as the fair market value less a reasonable realtor's fee (6%); deed stamps (\$1,618.80) and

anticipated costs incurred for a real estate closing of \$500.00.

12. The note and mortgage are in default for the July 1, 2006 payment, and all payments thereafter plus reasonable attorney's fees and costs and other charges incurred by the movant.

13. The debtor has indicated her intention of surrendering this property.

14. The movant seeks relief from stay as a secured creditor to enforce its rights under its loan documents and applicable law. In support thereof, the movant states that it is entitled to relief:

I. Pursuant to 11 U.S.C. 362 (d)(1) for cause on the basis that the debtor is in default on said contractual obligations, the primary purpose of a Chapter 7 proceeding is to liquidate the assets of the debtor, there is no equity and the trustee has no motivation to liquidate the subject property; and

II. Pursuant to 11 U.S.C. 362 (d)(2) on the basis that there is no equity in the subject property and, there being no reorganization in prospect, the property is not necessary for effective reorganization.

WHEREFORE, the movant prays that it, and its successors and/or assigns, be granted relief from the automatic stay for the purpose of: (i) exercising its rights under its agreements with the debtor and under applicable law, including, without limitation, taking possession of the mortgaged premises and/or foreclosing or accepting a deed in lieu of foreclosure of its mortgage on said premises; (ii) preserving its right to seek any deficiency to the extent permitted by state and federal law, including 11 U.S.C. §524(a); (iii) bringing such actions, including, without limitation, summary process proceedings, as are permissible by law; and (iv) that the Court order such other and further relief as may be just and proper.

Respectfully submitted,

Deutsche Bank National Trust Company, as Trustee
for GSAMP TRUST 2006-S1 Mortgage Pass-
Through Certificates, Series 2006-S1,
By its Attorney

/s/ Andrew S. Harmon

Andrew S. Harmon, Esquire

BBO# 568213

HARMON LAW OFFICES, P.C.

P.O. Box 610389

Newton Highlands, MA 02461-0389

617-558-0500

Dated: October 20, 2006

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS
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CERTIFICATE OF SERVICE

I, Andrew S. Harmon, Esquire, state that on October 20, 2006, I electronically filed the foregoing Motion for Relief from Stay and Proposed Order with the United States Bankruptcy Court for the District of Massachusetts using the CM/ECF System. I served the foregoing document on the following CM/ECF participants:

John Fitzgerald, Assistant U.S. Trustee

Debora Casey, Trustee

Terrence L. Parker, Esq. for the Debtor

I certify that I have mailed by first class mail, postage prepaid the documents electronically filed with the Court on the following non CM/ECF participants:

/s/ Andrew S. Harmon

Andrew S. Harmon, Esquire
BBO# 568213

Claudia Vivien Pearson
14 Sycamore Ave.
Brockton, MA 02301

City of Brockton
45 School Street
Brockton, MA 02401

Washington Mutual
P.O. Box 1093
Northridge, CA 91328

ASH//200610-0078/Pearson, Claudia

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS
EASTERN DIVISION

In re:

Claudia Vivien Pearson,

Debtor.

CHAPTER 7
CASE NO. 06-13299-WCH

**Order Granting Deutsche Bank National Trust Company, as Trustee for GSAMP TRUST
2006-S1 Mortgage Pass-Through Certificates, Series 2006-S1 Relief
From The Automatic Stay And Leave To Foreclose Mortgage**

This matter has come before the Court, and after full consideration, and no objections having been filed after proper notice, it is hereby ordered that Deutsche Bank National Trust Company, as Trustee for GSAMP TRUST 2006-S1 Mortgage Pass-Through Certificates, Series 2006-S1, its Successors and/or Assigns, Motion for Relief From the Automatic Stay is hereby granted and it may proceed to foreclose or accept a deed in lieu of foreclosure of the mortgage given by Claudia Vivien Pearson to Long Beach Mortgage Company, dated June 23, 2005 and recorded with the Plymouth County Registry of Deeds at Book 30898, Page 260 and which covers the premises located at 14 Sycamore Ave., Brockton, MA 02301, and may exercise its rights under said Mortgage, including preserving its right to seek any deficiency to the extent permitted by state and federal law, including 11 U.S.C. §524(a), and may bring such actions, including, without limitation, summary process proceedings, as are permissible by law, all as set forth in its Motion.

Honorable William C. Hillman
United States Bankruptcy Judge

200610-0078